

employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under [the Bankruptcy Code], or to recover a claim against the debtor that arose before the commencement of the [bankruptcy] case” and “any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate.” 11 U.S.C. § 362(a)(1), (3).

PLEASE TAKE FURTHER NOTICE that through the above-captioned civil action, the Plaintiffs, Aaron Randolph, David Carroll, and Eddie Cook, are attempting to recover a claim against a Debtor that arose before the commencement of the Debtors’ Chapter 11 Cases. Accordingly, continuation of the above-referenced civil action is automatically stayed under the Bankruptcy Code. In addition, the Debtors reserve their right to bring an action in the Bankruptcy Court for any violation of the automatic stay under section 362(a) of the Bankruptcy Code related, among other things, to the commencement of this action.

PLEASE BE FURTHER ADVISED that effective as of March 31, 2017, the Bankruptcy Court entered an *Order Enforcing the Protections of Sections 362, 365, 525, and 541(c) of the Bankruptcy Code Pursuant to Section 105 of the Bankruptcy Code*, a copy of which is attached as **Exhibit C**.

PLEASE BE FURTHER ADVISED that any action taken against the Debtors without obtaining, from the Bankruptcy Court, relief from the Automatic Stay is void *ab initio* and may result in a finding of contempt for violation of the Automatic Stay. The Debtors reserve and retain their statutory right to seek relief in the Bankruptcy Court from any action by Plaintiff(s) or any judgment, order, or ruling entered in violation of the Automatic Stay.

In the event the Court or any parties have questions regarding the Chapter 11 Cases,
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Dated: March 1, 2018

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Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION**

AARON RANDOLPH, DAVID CARROLL, and EDDIE COOK,)	
)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:17-cv-03436-MGL
)	
WECTEC CONTRACTORS, INC., F/N/A CB&I CONTRACTORS, INC., and CB&I CONTRACTORS, INC.,)	
)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2018, I electronically filed the foregoing,
**SUGGESTION OF BANKRUPTCY FILING AND IMPOSITION OF AUTOMATIC
STAY PURSUANT TO SECTION 362(a) OF THE BANKRUPTCY CODE, with Exhibits
A-C,** with the Clerk of the Court using the CM/ECF system, which will automatically send email
notification of such filing to the following attorneys of record:

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